

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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12-18-17

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Keshawn Freeman

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

1:17cv09126

Judge: Gary Feinerman

Magistrate Judge Jeffrey T. Gilbert

PC 7

vs.

Case
(To be supplied by the Clerk of this Court)

Officer Tankson

Tom Dart (Place Holder)

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:

☒

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)

☐

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)

☐

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

I. Plaintiff(s):

- A. Name: Keshawn Freeman
- B. List all aliases: Tavan Freeman, Kejuan Boyd
- C. Prisoner identification number: # 20170315205
- D. Place of present confinement: Cook County Dept of Corrections
- E. Address: P.O. Box 089002

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: Tankson
Title: Officer
Place of Employment: Cook County Dept of Corrections
- B. Defendant: Tom Dart
Title: Cook County Sheriff
Place of Employment: State of Illinois
- C. Defendant: _____
Title: _____
Place of Employment: _____

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: N/A
- B. Approximate date of filing lawsuit: N/A
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: N/A
- D. List all defendants: N/A
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): N/A
- F. Name of judge to whom case was assigned: N/A
- G. Basic claim made: N/A
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): N/A
- I. Approximate date of disposition: N/A

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

on the date of 8-2-17 around 11:00AM to 12:00PM during 1st shift Division II. I was called from my tier CA for a call pass to the dentist. Officer Tankson was the officer escorting me to the dentist which is a part of the spencery. I was sad because one of my uncles were on the tier housed with me, but he was moved to a different tier and attacked and stabbed by different detainees. I had a frown and sad look on my face, so officer Tankson asked me why I was frowning? I told officer Tankson what I was going through and what had happened to my uncle. officer Tankson replied by saying your uncle should've stayed with your ass then. I know your uncle he's a clown. I asked officer Tankson to stop playing with me? officer Tankson replied back to me upset stating what the fuck did you just say to me? I then repeated myself stating I said stop playing with me and I added I'm not your child, your child is at home. He turned around and got and my face then started punching me in my face repeatedly with his fist. officer Ms Dixon and another officer (unknown) to me pulled / ^{Grabbed} ~~officer~~ officer Tankson from off of me and stopped officer Tankson from continuing to attack me by punching me

in my face. I was seen by the Nurses in the spencery for my
 injuries that officer Tankson gave me. I suffered trauma to my
 left eye, and a busted lip from officer Tankson attacking me. The
 nurses from the health care spencery sent me to Cermak. I almost
 lost Conscious. After I came from Cermak I was put in holding
 and ~~transferred~~ ^{transferred} to Division 10 for no reason at all. I was the
 Victim in the whole situation. I was attacked by officer Tankson
 a Cook County Correctional official. I was attacked right in
 front of the health care spencery. The cameras in Division 11
 near the spencery on the 1st Floor caught the officer ^{Tankson} attacking
 me. I exhausted all my Grievance Remedies like I was suppose
 to do. Officer Tankson had no reason to attack me. I was a
 threat to any officers or showed no type of ~~threat~~ ^{threat} to anyone.
 There was no reason for officer Tankson ~~physical~~ ^{physical} behavior
 toward me, or his ~~misconduct~~ ^{misconduct} of assaulted me. When
 officer Tankson is suppose to be protecting me. my Rights
 have been violated and there is no Justification of officer
 Tankson actions. No detainee should be attacked by any
 officers in any jail including the Dept of Corrections (Cook County)

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I will like my filing fees paid for by the Cook County Dept of
Correctional with compensation of \$200,000 and officer
Tankson fired from his duty as an correctional officer.

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this _____ day of _____, 20____

Keyshawn Freeman
 (Signature of plaintiff or plaintiffs)

Keyshawn Freeman
 (Print name)

20170315205
 (I.D. Number)

Cook County Dept of Corrections

Po Box 089002

Chicago, IL 60608
 (Address)

Meshaun Freeman

ID# 20170315205

P.O. Box 089002

Chicago IL 60608

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Judge: Gary Feinerman
Magistrate Judge Jeffrey T. Gilbert
PC 7



Prisoner Correspondent

United States District Court

219 S. Dearborn Street 20th Floor

Chicago, IL 60604

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